

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

AGIS SOFTWARE DEVELOPMENT
LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

CIVIL ACTION NO. 2:19-cv-361-JRG
(LEAD CASE)

JURY TRIAL DEMANDED



**DECLARATION OF BILL TRAC IN SUPPORT OF GOOGLE'S REPLY
IN SUPPORT OF ITS MOTION TO TRANSFER VENUE TO THE
NORTHERN DISTRICT OF CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

I, Bill Trac, hereby declare as follows:

1. I am an attorney at the law firm of O'Melveny & Myers LLP, counsel for Defendant Google LLC in the above-entitled consolidated action. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.
2. Attached as **Exhibit U** is a true and correct copy of an email dated June 8, 2020 sent by counsel for Google to counsel for AGIS announcing the availability of source code for inspection at O'Melveny's Silicon Valley office.
3. Attached as **Exhibit V** is a true and correct copy of an image obtained through Google Street View depicting an entrance to 100 W. Houston St., Marshall, TX.
4. Attached as **Exhibit W** is a true and correct copy of an attorney search for Justin Truelove using the "Find a Lawyer" function of the State Bar of Texas website,

www.texasbar.com, showing the address of Mr. Truelove and Truelove Law Firm as 100 West Houston, Marshall, TX.

5. Attached as **Exhibit X** is a true and correct copy of highlighted excerpts from the transcript of the jury trial in *U.S. v. Trinity Industries, Inc.*, No. 2:12-cv-00089-JRG, in which Kurt Truelove is introduced as the husband of Jennifer Truelove.

6. Attached as **Exhibit Y** is a true and correct copy of an email dated October 15, 2020 sent by counsel for AGIS to counsel for Google regarding whether counsel for Defendants represents prior art witnesses Richard Haney, Samuel Altman, Michael Sheha, Angie Sheha, Stephen Petilli, and Neil Siegel.

7. Attached as **Exhibit Z** is a true and correct copy of highlighted excerpts from the transcript of the October 21, 2020 deposition of Eric Armstrong in the above captioned litigation.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California on January 14, 2021.

/s/ Bill Trac
Bill Trac